

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:21 CR 00536 AGF NCC
	)	
CHRISTOPHER FRANKLIN,	)	
	)	
Defendant.	)	

**MOTION FOR CONTINUED DETENTION**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Catherine M. Hoag, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged with aiding and abetting and accessory after the fact of a robbery on federal territorial jurisdiction, in violation of Title 18, United States Code, Sections 2111, 2, and 3;
2. Pursuant to Title 18, United States Code, Section 3142(g), the nature of the charges against the defendant, the weight of the evidence against defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release additionally warrant defendant's detention pending trial.
3. As stated above, the defendant is charged with aiding and abetting and accessory after the fact of a robbery on territorial jurisdiction. The robbery in this case involved a firearm, making it

one of the enumerated offenses in Title 18, United States Code, Section 3142(g)(1), which weighs in favor of detention.

4. Additionally, the evidence in this case is strong. Officers responded to a call for an armed robbery that occurred on the Gateway Arch grounds. The victims reported that their personal belongings had been taken at gunpoint, including their cell phones, and provided a description of the suspect. The police were able to track the cell phones' locations to a resale kiosk at a Walmart in Collinsville, Illinois. It was determined that three suspects sold victims' cell phones to the resale kiosk. From video and surveillance footage from Walmart, as well as from the Gateway Arch grounds, officers were able to identify the vehicle used by the suspects and the license plate number. That vehicle, a Honda Accord, was registered to defendant Franklin's father. On September 15, 2021, the Honda Accord was stopped in the same area of downtown St. Louis, near the Arch grounds. Both defendants, as well as the juvenile suspect, were in the vehicle at the time of the stop. A firearm was located on the backseat of the vehicle where the juvenile was sitting. All three suspects were detained and taken into custody. During an interview, defendant Franklin initially denied any involvement in the incident. However, defendant Franklin eventually admitted that he drove the juvenile and defendant Sloan to downtown St. Louis and let the juvenile out near the Gateway Arch grounds. Defendant Franklin further admitted that he knew the juvenile was armed with a gun, and that when the juvenile returned to the vehicle, he had robbed someone and stolen their belongings. Defendant Franklin further admitted that he was with the juvenile and defendant Sloan when they sold the cell phones at Walmart.

5. Although defendant Franklin has no criminal convictions, he was located in the same area two days after the armed robbery, at approximately the same time, in the same vehicle, with the same individuals, with a handgun in the backseat. Traffic footage indicates that the vehicle was circling the area and driving erratically, suggesting to law enforcement that the defendants and juvenile suspect were likely to engage in similar behavior as on the day of the robbery had the vehicle not been stopped.

Furthermore, the armed robbery on September 13, 2021 happened in broad daylight, in a highly public and well-trafficked location. This brazen and extremely dangerous behavior indicates that defendant poses a serious risk of danger to the community.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

SAYLER A. FLEMING  
United States Attorney

*s/Catherine M. Hoag*  
CATHERINE M. HOAG, #67500MO  
Assistant United States Attorney